

January 9, 2025

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: Enbridge Gas Inc.
Application for Renewal of Franchise Agreement
County of Lennox and Addington
Ontario Energy Board File No. EB-2024-0134**

We are counsel for Enbridge Gas Inc. ("**Enbridge Gas**").

We understand from OEB Staff that the OEB intends on cancelling the oral hearing on this Application that had been scheduled for January 13, 2025. OEB Staff has asked whether, in light of this, Enbridge Gas wishes to add anything further to its two-page written overview of its argument-in-chief. Assuming that our understanding regarding the OEB's intentions for the oral hearing is correct, Enbridge Gas has nothing further to add to its summary, subject to the below.

For context, Concerned Residents ("**CR**") has now conceded in its January 6, 2025 letter (the "**January 6 Letter**") that its proposed deviations from the Model Franchise Agreement ("**MFA**"), including the underlying rationale for same, are out of scope for this proceeding (as Enbridge Gas has and OEB Staff have consistently maintained). CR goes further in the January 6 Letter to specifically argue that the OEB should not even make any decisions on the positions CR originally advanced. CR has further confirmed that it no longer seeks to participate in the upcoming hearing for these same reasons. In the January 6 Letter, CR also seeks to preserve its ability to provide additional written submissions.

Enbridge Gas maintains its position that the OEB ought to grant the requested orders being sought in this Application. Enbridge Gas has no further submissions to make beyond its currently filed summary based on our understanding that CR does not intend, nor will it be permitted, to make any further submissions in this Application.

Finally, the January 6 Letter argues (for the first time) that Enbridge Gas failed to properly answer interrogatory #11. As CR has expressly committed to not seek any relief relating to this issue, and given its retreat from its earlier position on which this interrogatory was predicated, Enbridge Gas submits that CR's arguments on this point are irrelevant and do not merit consideration for the purposes of this Application.

In any event, Enbridge Gas maintains that it provided a full and adequate response to interrogatory #11 on December 3, 2024 at Exhibit EGI-CR-11 Supp. Enbridge Gas disclosed all of the relevant information it could in its response recognizing that the Senior Advisor who was directly involved in the verbal discussions with the County of Lennox and Addington is no longer

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with Enbridge Gas. Regardless, County Staff has confirmed that its previously communicated issues raise no hurdles to proceeding with the unamended MFA.

Yours truly,

AIRD & BERLIS LLP

A handwritten signature in black ink, appearing to read 'Patrick Copeland', with a long horizontal flourish extending to the right.

Patrick Copeland
Partner

PC